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Attorneys for Christina W. Lovato, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEVADA**

In re  
  
DOUBLE JUMP, INC.  
  
Debtor.

Lead Case No.: BK-19-50102-gs  
(Chapter 7)

Substantively consolidated with:

19-50130-gs	DC Solar Solutions, Inc.
19-50131-gs	DC Solar Distribution, Inc.
19-50135-gs	DC Solar Freedom, Inc.

CHRISTINA W. LOVATO,  
  
Plaintiff,  
  
v.  
  
KING SOLARMAN, INC., CHIANG LIAN  
CUNG a/k/a MICHAEL CUNG, KING  
SOLARMAN (INDION) FUND I, LLC, and  
KING SOLARMAN (INDION) FUND II,  
LLC,  
  
Defendant(s).

Adversary No.: 21-05028-gs

**TRUSTEE’S REPORT IN CONNECTION  
WITH STATUS CONFERENCE  
SCHEDULED FOR DECEMBER 9, 2022**

Christina W. Lovato, as chapter 7 trustee and plaintiff (“*Trustee*”) in the above-captioned adversary proceeding (“*Adversary*”), provides this report in connection with the status conference scheduled to be conducted by this Court on December 9, 2022.

1           **I. Status of Adversary Proceeding**

2           As reflected on the docket, the Trustee has filed an operative complaint, the above-  
3 captioned defendants (“*Defendants*”) have filed an Answer (which includes affirmative defenses),  
4 and the Court has entered a Scheduling Order [ECF No. 111].

5           **II. Status of Discovery**

6           Generally:

- 7           • The Parties have issued written discovery which has been responded to by the receiving  
8 party. The Parties have met and conferred, orally and in writing, on certain discovery  
9 issues.
  - 10           ○ To date, neither party has sought judicial intervention on a discovery issue.
- 11           • The Parties have communicated about deposition discovery.

12           **III. Status of Dispositive Motions**

13           The Trustee filed a motion for partial summary judgment (“*MPSJ*”) but has voluntarily  
14 withdrawn that motion without prejudice. The Trustee contemplates filing at least one dispositive  
15 motion later in this proceeding, including but not limited to on the basis and subject matter set  
16 forth in the Trustee’s MPSJ.

17           **IV. Scheduling Order and Fact Discovery**

18           The Scheduling Order, among other things, provides for fact discovery to be commenced  
19 in time to be completed by February 28, 2023. The Trustee reasonably expects that she can  
20 complete her fact discovery by this deadline, or in the alternative, contemplates potentially seeking  
21 a relatively short extension of time.

22           **V. Mediation**

23           The Parties mediated pre-commencement of this Adversary. The Trustee, in good faith, is  
24 willing to have further settlement communications with the Defendants whether informally or  
25 formally through a judicial settlement conference or private mediation.

26           **VI. Further Status Conference**

27           The Trustee respectfully requests that this Court set a status conference in mid-late January,  
28 or as otherwise convenient for the Court.

1 DATED: December 6, 2022.

2 **HARTMAN & HARTMAN**

3 /s/ Jeffrey L. Hartman  
4 Jeffrey L. Hartman, Esq.,  
5 *Attorney for Plaintiff Christina W. Lovato*

6 **MELAND BUDWICK, P.A.**

7 /s/ Meaghan E. Murphy  
8 Michael S. Budwick, Esq., Admitted Pro Hac Vice  
9 Solomon B. Genet, Esq., Admitted Pro Hac Vice  
10 Meaghan E. Murphy, Esq., Admitted Pro Hac Vice  
11 Gil Ben-Ezra, Esq., Admitted Pro Hac Vice  
12 Alexander E. Brody, Esq., Admitted Pro Hac Vice  
13 *Attorneys for Plaintiff Christina W. Lovato*

**CERTIFICATE OF SERVICE**

I certify that on December 6, 2022, I caused to be served the following document(s):

**TRUSTEE'S REPORT IN CONNECTION WITH STATUS CONFERENCE  
SCHEDULED FOR DECEMBER 9, 2022**

I caused to be served the above-named document(s) as indicated below:

✓ a. Via ECF to:

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I declare under penalty of perjury that the foregoing is true and correct.

DATED: December 6, 2022.

/s/ Meaghan E. Murphy, Esq.

Meaghan E. Murphy, Esq.